

**UNITED STATES BANKRUPTCY COURT FOR THE MIDDLE  
DISTRICT OF PENNSYLVANIA**

IN RE:		CASE NO. 16-02478-MDF
Dana Hamberger		
	Debtor	CHAPTER 13
Citizens Bank, N.A.		
	Movant	
Dana Hamberger Respondents/De btors		
Charles J. DeHart, III, Standing Trustee Additional Respondent		

**DEBTOR'S ANSWER TO MOTION BY CITIZENS BANK, N.A. FOR RELIEF FROM  
AUTOMATIC STAY PURSUANT TO 11 U.S.C. SECTION 362(d)**

AND NOW, this 31<sup>st</sup> day of October, 2016, the Debtor, Dana Hamberger, by and through his attorney, Dawn M. Cutaia, files this Answer and in support thereof states the following:

1. Admitted.
2. Admitted.
3. Admitted.

4. Denied. Attached as Exhibit A is a copy of the receipts for Debtor's payments, which were paid in person at a Citizens Bank branch. Debtor attempted to make the most recent payment, but Citizens Bank refused to accept the payment (presumably because this Motion for Relief was pending).

5. Denied.
6. Admitted.

WHEREFORE, Debtor respectfully requests this Honorable Court deny the Motion for Relief from Stay.

/s/ Dawn M. Cutaia  
Attorney for Debtor  
Supreme Court ID 77965  
Cutaia Law, LLC  
115 E. Philadelphia Street  
York, PA 17401  
717-304-1841




Delco Plaza  
WEDNESDAY, SEPTEMBER 21, 2016  
11:38

Please save this receipt until you have  
verified your account statement.

Payment

Account Number: XXXXXXXXXXXXX1400  
Amount: \$427.64

Teller Number: J057377  
Bank: 060  
Branch: 318  
Transaction #: 3318032272

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1-800-922-9999

Please see back for important disclosures.


Delco Plaza  
MONDAY, AUGUST 22, 2016  
10:35

Please save this receipt until you have  
verified your account statement.

Payment

Account Number: XXXXXXXXXXXXX1400  
Amount: \$427.64

Teller Number: J057377  
Bank: 060  
Branch: 318  
Transaction #: 3318036589

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